

Philip Touitou (PT - 4302)  
HINSHAW & CULBERTSON LLP  
Attorneys for Defendants  
*Wiss, Janney, Elstner Associates Inc. and*  
*Rolf Jensen & Associates*  
780 Third Avenue, 4th Floor  
New York, New York 10017  
(212) 471-6200 (Telephone)  
(212) 935-1166 (Facsimile)

FILED  
OCT 25 2007  
CLERK OF COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DR. MORGAN REYNOLDS ON BEHALF OF  
THE UNITED STATES OF AMERICA,

Plaintiff/Relator,

-against-

SCIENCE APPLICATIONS  
INTERNATIONAL, CORP.; APPLIED  
RESEARCH ASSOCIATES, INC.; BOEING;  
NUSTATS; COMPUTER AIDED  
ENGINEERING ASSOCIATES, INC.;  
DATASOURCE, INC.; GEOSTAATS, INC.;  
GILSANZ MURRAY STEFICEK LLP;  
HUGHES ASSOCIATES, INC.; AJMAL  
ABBASI; EDUARDO KAUSEL; DAVID  
PARKS; DAVID SHARP; DANIELLE  
VENEZANO; JOSEF VAN DYCK; KASPAR  
WILLIAM; ROLF JENSEN & ASSOCIATES,  
INC.; ROSENWASSER/GROSSMAN  
CONSULTING ENGINEERS, P.C.; SIMPSON  
GUMPERTZ & HEGER, INC.; S.K. GHOSH  
ASSOCIATES, INC.; SKIDMORE, OWINGS  
& MERRILL, LLP; TENG & ASSOCIATES,  
INC.; UNDERWRITERS LABORATORIES,  
INC.; WISS, JANNEY, ELSTNER  
ASSOCIATES, INC.; AMERICAN AIRLINES;  
SILVERSTEIN PROPERTIES; AND UNITED  
AIRLINES,

Defendants.

No. 07 CIV 4612 (GBD)

NOTICE OF MOTION

**PLEASE TAKE NOTICE**, that upon the annexed Affidavit of Philip Touitou, with exhibits, Defendants, WISS, JANNEY, ELSTNER ASSOCIATES, INC. and ROLF JENSEN &


ASSOCIATES, INC., shall move this Court before the Honorable George B. Daniels, U.S.D.J. at the United States Courthouse, 500 Pearl Street, New York, New York, 10007 on a date and time to be set by the court for an Order pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York granting admission pro hac vice in this matter to attorneys Kevin R. Sido and Renee C. Choy of the firm of Hinshaw & Culbertson LLP, 222 North LaSalle, Suite 300, Chicago, IL 60601-1081, telephone number (312) 704-3000, fax number (312) 704-3001, members in good standing of the Bar of the State of Illinois, on behalf of Defendants Wiss, Janney, Elstner Associates, Inc. and Rolf Jensen & Associates, Inc.

There are no pending disciplinary proceedings against Kevin R. Sido or Renee C. Choy in any State or Federal Court.

Dated: New York, New York  
October 25, 2007

Respectfully submitted,

HINSHAW & CULBERTSON LLP

By:   
Philip Toxitou [PT-4302]  
780 Third Avenue, 4th Floor  
New York, New York 10017  
(212) 471-6200 (Phone)  
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Philip Touitou (PT - 4302)  
HINSHAW & CULBERTSON LLP  
Attorneys for Defendants  
*Wiss, Janney, Elstner Associates Inc. and*  
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UNITED STATES DISTRICT COURT  
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& MERRILL, LLP; TENG & ASSOCIATES,  
INC.; UNDERWRITERS LABORATORIES,  
INC.; WISS, JANNEY, ELSTNER  
ASSOCIATES, INC.; AMERICAN AIRLINES;  
SILVERSTEIN PROPERTIES; AND UNITED  
AIRLINES,

Defendants.

**No: 07 CIV 4612 (GBD)**

**AFFIDAVIT OF PHILIP TOUITOU  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

PHILIP TOUITOU, being first duly sworn, deposes and says as follows:

1. I am a partner at Hinshaw & Culbertson LLP, counsel for Defendants, WISS, JANNEY, ELSTNER ASSOCIATES, INC. and ROLF JENSEN & ASSOCIATES, INC., in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit attorneys Kevin R. Sido and Renee C. Choy of the Chicago office of Hinshaw & Culbertson LLP to appear pro hac vice on behalf of defendants Wiss, Janney, Elstner Associates, Inc. and Rolf Jensen & Associates, Inc., in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Kevin R. Sido for over three years. Mr. Sido is a partner of Hinshaw & Culbertson LLP's Chicago, Illinois office, and is in good standing with the Bar of the Supreme Court of Illinois. Mr. Sido is a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. A copy of his Certificate of Admission to the Bar of Illinois is attached hereto as Exhibit A.

4. I have known Renee Choy for over one year. Ms. Choy is an associate at Hinshaw & Culbertson LLP in Chicago, Illinois, and is in good standing with the Bar of the Supreme Court of Illinois. Ms. Choy is a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. A copy of her current Certificate of Admission to the Bar of Illinois is attached hereto as Exhibit B.

5. Accordingly, I am pleased to move the admission of Kevin R. Sido and Renee C. Choy pro hac vice to appear in this action.

**WHEREFORE**, it is respectfully requested that the motion for the admission of Kevin R. Sido and Renee C. Choy pro hac vice to appear in this action on behalf of defendants WISS, JANNEY, ELSTNER ASSOCIATES, INC. and ROLF JENSEN & ASSOCIATES, INC. in the above-captioned matter be granted.

Dated: New York, New York  
October 25, 2007

Respectfully submitted,

HINSHAW & CULBERTSON LLP

By: 

Philip Touitou [PT-4302]  
780 Third Avenue, 4<sup>th</sup> Floor  
New York, New York  
(212) 471-6200 (Telephone)  
(212) 935-1166 (Facsimile)

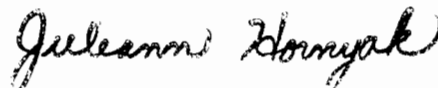
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Kevin Richard Sido

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on October 22, 1975 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Thursday, October 11, 2007.

A handwritten signature in cursive script, reading "Juleann Hornyak".

Clerk

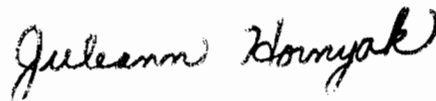
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Renee Chi-Ying Choy

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 2005 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Thursday, October 11, 2007.

A handwritten signature in cursive script, reading "Juleann Hornyak".

Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DR. MORGAN REYNOLDS, on behalf of the UNITED  
STATES OF AMERICA,

Plaintiff/Relator,

- against -

SCIENCE APPLICATIONS INTERNATIONAL CORP.,  
APPLIED RESEARCH ASSOCIATES, INC.; BOEING;  
NuSTATS; COMPUTER AIDED ENGINEERING  
ASSOCIATES, INC.; DATASOURCE, INC.;  
GEOSTAATS, INC.; GILSANZ MURRAY STEFICEK  
LLP; HUGHES ASSOCIATES, INC.; AJMAL ABBASI;  
EDUARDO KAUSEL; DAVID PARKS; DAVID  
SHARP; DANIELE VENEZANO; JOSEF VAN DYCK;  
KASPAR WILLIAM; ROLF JENSEN & ASSOCIATES,  
INC.; ROSENWASSER/GROSSMAN CONSULTING  
ENGINEERS, P.C.; SIMPSON GUMPERTZ & HEGER,  
INC.; S.K. GHOSH ASSOCIATES, INC.; SKIDMORE,  
OWINGS & MERRILL, LLP; TENG & ASSOCIATES,  
INC.; UNDERWRITERS LABORATORIES, INC.;  
WISS, JANNEY, ELSTNER ASSOCIATES, INC.;  
AMERICAN AIRLINES; SILVERSTEIN PROPERTIES;  
and UNITED AIRLINES,

Defendants.

**CERTIFICATE OF  
SERVICE**

Docket No. 07-CV-4612  
(GBD)(DF)

The undersigned certifies that on October 25, 2007, I caused to be served the foregoing Notice of Motion, Affidavit and Order upon the following addressees at their last known address by mailing the same in a sealed envelope, with postage prepaid thereon, in an official depository of the United States Postal Service within the State of New York:

Jerry Vincent Leaphart, Esq.  
8 West Street, Suite 203  
Danbury, CT 06810  
(203) 825-6265  
*Attorney for Dr. Morgan Reynolds*

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310 West Burke Street  
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(304) 263-8800




David M. Pollack, Esq.  
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233 Broadway  
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Philip Carmine Semprevivo, Esq.  
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Michael J. Vardaro, Esq.  
Zetlin & De Chiara, LLP  
Attorneys for Defendant  
Skidmore, Owings & Merrill, LLP  
801 Second Avenue  
New York, NY 10017

Dated: New York, New York  
October 25, 2007

  
ALFRAE JOHNSON-RAGINS

Philip Touitou (PT - 4302)  
HINSHAW & CULBERTSON LLP  
Attorneys for Defendants  
*Wiss, Janney, Elstner Associates Inc. and*  
*Rolf Jensen & Associates*  
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SILVERSTEIN PROPERTIES; AND UNITED  
AIRLINES,

Defendants.

**No: 07 CIV 4612 (GBD)**

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of PHILIP TOUITOU, attorney for Defendant, WISS, JANNEY, ELSTNER ASSOCIATES, INC. and ROLF JENSEN & ASSOCIATES, INC., and said sponsor attorney's affidavit in support:

**IT IS HEREBY ORDERED that**

KEVIN R. SIDO  
Hinshaw & Culbertson LLP  
222 North LaSalle Street, Suite 200  
Chicago, Illinois 60601  
Tel: (312) 704-3000  
Fax: (312) 704-3001  
Email: [ksido@hinshawlaw.com](mailto:ksido@hinshawlaw.com)

RENEE C. CHOY  
Hinshaw & Culbertson LLP  
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Chicago, Illinois 60601  
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Fax: (312) 704-3001  
Email: [rchoy@hinshawlaw.com](mailto:rchoy@hinshawlaw.com)

are admitted to practice pro hac vice to argue or try this particular case in whole or in part on behalf of Defendants WISS, JANNEY, ELSTNER ASSOCIATES, INC. and ROLF JENSEN & ASSOCIATES, INC. in the above captioned case. A notation of Ms. Choy's and Mr. Sido's admission pro hac vice will be made on the roll of attorneys.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys. If this action is assigned to the Electronic Case Filing (EFC) System, counsel shall immediately apply for an EFC password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward pro hac vice fee to the Clerk of the Court.

Dated: New York, New York  
\_\_\_\_\_, 2007

**SO ORDERED:**

\_\_\_\_\_  
HON. GEORGE B. DANIELS, U.S.D.J.